

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., MG
PREMIUM LTD, MG FREESITES LTD,
WEBGROUP CZECH REPUBLIC, A.S.,
NKL ASSOCIATES, S.R.O., SONESTA
TECHNOLOGIES, S.R.O., SONESTA
MEDIA, S.R.O., YELLOW
PRODUCTION S.R.O., PAPER STREET
MEDIA, LLC, NEPTUNE MEDIA, LLC,
JANE DOE, MEDIAME SRL, MIDUS
HOLDINGS, INC.,

Plaintiffs,

vs.

ANGELA COLMENERO, IN HER
OFFICIAL CAPACITY AS INTERIM
ATTORNEY GENERAL FOR THE STATE
OF TEXAS,

Defendant.

Case No.: 1:23-cv-917

**DECLARATION OF JANE DOE IN SUPPORT OF PLAINTIFFS' MOTION FOR
EXPEDITED PRELIMINARY INJUNCTION**

I, Jane Doe,¹ declare as follows:

1. I provide this declaration in support of the Expedited Motion for Preliminary Injunction against enforcement of Tex. Civ. Prac. & Rem. Code § 129B *et seq.* I am over eighteen years of age, and I have personal knowledge of the matters set forth in this Declaration; if called as a witness I could and would testify competently to these matters.

2. I am an adult film actor and have worked in the adult industry for 18 years.

3. My business consists of producing legal content—featuring only consenting adults—for an adult audience in the forms of videos, photos, and written material, both individually and with other performers, models, and production teams. I then publish the content I make on various platforms and applications, including Pornhub, Camsoda, Sextpanther, and MFC.

4. Producing adult content is a form of self-expression for me to honor my sexuality and authentically play and perform in ways that benefit me emotionally and psychologically.

5. The Texas law requiring online platforms that contain adult material beyond a certain threshold to verify that users are 18 years or older will inevitably reduce my ability to post and distribute legal adult content and directly impact my ability to share the artistic messages I want to convey with it.

6. I also believe that this Texas law is also particularly harmful, because it forces online platforms that contain adult material to display pseudoscientific, inaccurate health warnings that spread misinformation about the effects of adult content, including the false notion that adult content causes criminal sexual exploitation. As a longtime certified sexuality professional, and participant in entertainment, I recognize the cultural driving factors behind the proliferation of misinformation and shaming about sex.

7. I absolutely do not want any minors to view my content. But I believe that there

¹ Jane Doe is a pseudonym. I am proceeding under a pseudonym to protect my right to privacy and myself from discrimination, harassment, and violence, as well as retaliation for seeking to protect my rights.

are other, more effective ways of preventing minors from being exposed to adult content, which do not burden the rights of adults.

I declare under penalty of perjury under the laws of Oregon that the foregoing is true and correct to the best of my knowledge.

Executed on August 1, 2023, in Portland, Oregon.

Dated: August 1, 2023

/s/ Jane Doe
Jane Doe